Recommendation #293

Remedial Actions and Clean-up of 235-F

Background

Building 235-F is a former process building at SRS primarily associated with Pu-238 processing and storage along with other isotopes of plutonium processing to a lesser extent. In recent years Building 235-F has been a low priority concern for cleanup since no process operations occur in 235-F, the building is normally unoccupied, all accountable inventory quantities of plutonium have been removed from the building, and the building is essentially "dark and dry."

As a result of this status the Citizens Advisory Board has had little interest or involvement in cleanup plans for 235-F. However, it has recently come to light that 235-F poses a more significant risk to both off-site public and on-site workers than the CAB had an understanding and appreciation of. The heightened concern and emphasis have come as a result of Defense Nuclear Facility Safety Board) Recommendation 2012-1 dated May 9, 2012. As stated in the Safety Board's_recommendation_there are significant residual quantities of Pu-238 in the building_ and this material is in a form susceptible to dispersal if subjected to a certain seismic event and a resultant fire stemming from an energized electrical line and a large combustible loading in the building.

The Safety Board's Recommendation is summarized below:

- Immobilize and/or remove the residual Pu-238.
- Remove all transient and fixed combustibles that are not directly necessary for activities.
- Ensure all necessary electrical equipment are in a safe configuration.
- Evaluate operability of early detection and alarm systems.
- Ensure that an integrated emergency response plan is in place.
- Ensure that periodic coordinated drills in response to a simulated event at 235-F are conducted & that the drills include appropriate response actions by personnel in the adjacent facilities and construction sites.

DOE formally accepted the Safety Board's Recommendation in a letter from Secretary Steven Chu dated July 12, 2012.

Discussion

While admittedly all of these events are low probability events, the substance of the Recommendation seems to suggest that this issue be dealt with more urgency perhaps than the CAB was aware of. Since this matter could impact the public and raise safety

concerns, the CAB believes that DOE needs to take a comprehensive look at the existing plans for decontamination and decommissioning of the building and reassess the present schedule for 235-F cleanup. Further, in view of comments made in the Safety Board's Recommendation, it seems prudent to take near-term immediate actions to remediate the situation.

Recommendations:

The Savannah River Site Citizens Advisory Board recommends that DOE reassess plans for cleanup of 235-F and place more emphasis on cleanup of the building. Specifically, it is requested that DOE:

- 1. Identify and implement plans for short term measures that could reduce the hazards identified in the Safety Board's Recommendation 2012-1.
- 2. Reassess the plans for decontamination & decommissioning of 235-F with more emphasis placed on earlier decontamination & decommissioning of 235-F.
- 3. Advise the CAB of other measures that could be taken to address concerns addressed in the Safety Board's Recommendation 2012-1.
- 4. Advise the CAB, no later than the January 2013 CAB meeting of the cost and timeline of implementing the Safety Board's Recommendation 2012-1 and how other projects will be impacted by the implementation of said Recommendation.